

Eric J. Gravel - SBN: 256672
Law Offices of Eric J. Gravel
1390 Market Street Suite 200
San Francisco, CA 94102
Ph: (650) 931-6000
ctnotices@gmail.com

Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In Re:

PARRY D MOSS

, Debtor

Case: 23-30413 DM
Chapter 13

Hearing Date: December 20, 2023
Time: 10:10 a.m.
Place: Telephone/Video

OPPOSITION TO CHAPTER 13 TRUSTEE MOTION TO DISMISS CASE

Eric J. Gravel, Attorney for Debtor Parry Moss, hereby OPPOSES the Chapter 13 Trustee Motion to Dismiss the case herein. This Opposition is based upon the following facts:

1. This case was commenced by the filing of a voluntary petition on behalf of the Debtor on June 27, 2023.
2. The Chapter 13 Trustee filed a Motion to Dismiss Case on 10/24/23 for failure to respond to Trustee's request.
3. Debtor proposes to address the issues raised by the Trustee with the following actions.
4. Debtor will resolve the objection to confirmation of plan by creditor, U.S. Bank National Association, with the filing of an amended plan.
5. The amended plan will list the claim of Sutterfield HOA as a Class 2 claim.
6. The amended plan will select the "none" box in Class 3.

- 1 7. Debtor will file an amended Creditor Matrix to ensure that all creditors, including the
2 IRS, receive notice of the Chapter 13 proceedings.
- 3 8. The Statement of Financial Affairs will be amended to list the dates of operation of the
4 debtor's business and the income information for the year 2023. The amended
5 Statement of Financial Affairs will include income from pensions and annuities.
- 6 9. Debtor will provide a copy of his 2020 Federal Income Tax Return.to the Trustee.
7

8 Wherefore, the Debtor requests that the Court deny the Chapter 13 Trustee Motion to
9 Dismiss Case.

10 Respectfully submitted on December 7, 2023.

11 /s/ Eric J. Gravel

12 Eric J. Gravel

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/s/ Wakako Gravel

David Burchard
Trustee in Bankruptcy
393 Vintage Park Drive
Suite 150
Foster City, CA 94404
Via ECF

U.S. Trustee
Office of the U.S. Trustee/SF
Phillip Burton Federal Building
450 Golden Gate Ave #05-0153
San Francisco, CA 94102
Via ECF